



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JS/JPM/ANR
F. #2015R00270

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 10, 2023

By ECF and Email

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Re: United States v. Anthony Villani et al.
Criminal Docket No. 22-405 (KAM)

Dear Counsel:

Enclosed please find the government's fourth production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which is Bates-

numbered VILLANI066329-066511. In accordance with the signed Protective Order, items are designated below as “Protected Discovery Material” and, along with this letter, are subject to the provisions of the Protective Order. The government will continue to provide discovery on a rolling basis and requests reciprocal discovery from the defendants.

I. The Government’s Discovery

A. Documents and Tangible Objects

Please find enclosed:

- Pleasantville Playa Bowl pole camera video surveillance footage [VILLANI066329-066365].¹
- GPS cellular data [VILLANI066336-066338].
- Cellular tower dump returns [VILLANI066339-066342].
- **PROTECTED DISCOVERY MATERIAL** – JPMorgan Chase Bank, N.A. seizure affidavit and warrant [VILLANI066343-066511].

You may examine the physical evidence discoverable under Rule 16, including original documents, by calling me to arrange a mutually convenient time.

¹ Given the voluminous nature of the video surveillance from the pole camera, the production will be available from a third-party vendor, DupeCoop, at your own cost. Instructions regarding how to contact DupeCoop will be sent to Counsel by email under separate cover.

II. Future Discussions

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/
Jennifer Sasso
James P. McDonald
Antoinette N. Rangel
Assistant U.S. Attorneys
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Enclosures

cc: Clerk of the Court (KAM) (by ECF) (without enclosures)